

1 KIRSCH ARAX AND BULMASH
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4 Beverly Hills, CA 90212
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105 DIVISION
JUN 12 10 45 AM '78
CLERK OF SUPERIOR COURT
SAN DIEGO CO
CALIFORNIA

6 Attorneys for Defendant
7 CIRCLE INTERNATIONAL CO.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO

10
11 GREMLIN INDUSTRIES, INC.,) CASE NO. 416704
12 a Delaware corporation,)
13) NOTICE OF DEPOSITIONS AND
14 Plaintiff,) NOTICE TO PRODUCE DOCUMENTS
15 vs.)
16 CIRCLE INTERNATIONAL, a)
17 California corporation, etc.)
18 et al.,)
19 Defendants.)

20 TO: Plaintiff GREMLIN INDUSTRIES, INC., a Delaware
21 corporation, and to its attorney of record, ERNEST BORUNDA, ESQ.:

22 NOTICE IS HEREBY GIVEN that Defendant CIRCLE INTERNATIONAL
23 CO., pursuant to the Code of Civil Procedure §2016 and §2019
24 and/or employees of Plaintiff
25 will take the Depositions of the following officers/ pursuant
26 to the schedule below before a Notary Public for the County of
27 San Diego, State of California at the Little America Westgate
28 Hotel, located at 1055 Second Avenue, San Diego, California 92101:

29 FRANK FOGELMAN 10:00 A.M. JUNE 26, 1978
30 GENE CANDELORE 2:00 P.M. JUNE 26, 1978

1 GERALD HANSEN 10:00 A.M. JUNE 27, 1978

2 RAY FOSTER 2:00 P.M. JUNE 27, 1978

3 YOU ARE FURTHER NOTIFIED that the Deponents, and each
4 of them, will be required to produce, then and there, at the
5 taking of said Depositions, the following documents for inspection
6 and copying which are under their custody and control:

7 All papers, books, photographs, tapes, reports, writings,
8 letters, letter agreements, notes, memoranda, or other correspondence
9 or writings, including drafts and file copies of the afore-
10 mentioned documents, for the period of January 1, 1977 through
11 June 26, 1978, including, but not limited to the following:

12 1. All correspondence from GREMLIN INDUSTRIES, INC.
13 to Defendant CIRCLE INTERNATIONAL CO. and/or Dean McMurdie;

14 2. All correspondence to GREMLIN INDUSTRIES, INC.
15 from CIRCLE INTERNATIONAL CO. and/or Dean McMurdie;

16 3. All letter agreements between GREMLIN INDUSTRIES,
17 INC., and CIRCLE INTERNATIONAL CO. and/or Dean McMurdie;

18 4. All purchase orders, shipping receipts, inventory
19 lists, checks, cancelled checks, bank statements and any
20 documentation pertaining to accounts receivable with regard
21 to the within action, credit memos issued and/or replacements issued.

22 5. All documents which relate in any way to communications
23 between CIRCLE INTERNATIONAL CO. and GREMLIN INDUSTRIES, INC.

24 6. All documents which in any way identify or relate
25 to any contract, agreement, understanding, or representation
26 (whether itself is written or oral) between Plaintiff and
27 Defendant herein.

28 If, for any reason, the taking of said Depositions,

1 examining and copying of said records, is not completed on said
2 dates, the taking of said Depositions and examination and
3 copying of said records will be continued from day to day
4 excluding Saturdays, Sundays and holidays until completed.

5 Dated: June 9, 1978

KIRSCH ARAK AND BULMASH

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7 By: Richard J. Greene

RICHARD J. GREENE, Attorneys
for Defendant CIRCLE INTERNATIONAL
CO.
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